

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE SQUIRRELS RESEARCH LABS LLC, *ET*
AL.

Debtors

CASE No. 21-61491-TNAP
(JOINTLY ADMINISTERED)
CHAPTER 11
SUBCHAPTER V
JUDGE PATTON

FREDERIC P. SCHWIEG, TRUSTEE

Plaintiff

V.

JESSICA GRITZAN

Defendant

ADVERSARY No. 23-06029

ALL DOCUMENTS REGARDING THIS
MATTER MUST BE IDENTIFIED BY **BOTH**
ADVERSARY AND BANKRUPTCY CASE
NUMBERS AND NAME OF JUDGE

JOINT STIPULATIONS

Plaintiff and Defendant hereby stipulate to the following for the purposes of this
adversary proceeding only:

1. The court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C. § 1334(b) and (d) and General Order 2012-07 of the United States District Court for the Northern District of Ohio.
2. This adversary proceeding is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (B), (C), (K) and (O).
3. On November 23, 2021 (the "Petition Date"), Squirrels Research Labs LLC ("Debtor") filed its voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code").
4. At issue in this matter are certain payments that the Trustee alleges that the Debtor made to the Defendant, as set forth in the attachment to the Complaint and attached hereto both as Exhibit A (the "Payments"). This stipulation is entered for all purposes in this matter, but one specific purpose is to allow the Court to rule on certain issues as a matter of

law. The parties anticipate that said ruling will simplify this matter for trial and may facilitate settlement of at least some claims.

5. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent, or obligations that the Defendant incurred, for, or in connection with, business-related travel on behalf of the Debtor (“Travel Expense Reimbursements”).

6. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent, or obligations that the Defendant incurred, for, or in connection with, the purchase of supplies, materials, electronic components or other goods used to directly produce the Debtor’s products (“Material Expense Reimbursements”).

7. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent, or obligations that the Defendant incurred, for, or in connection with, the purchase of materials and services for construction or remodeling of the Debtor’s premises (“Remodeling Reimbursements”).

8. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent, or obligations that the Defendant incurred, for, or in connection with, the purchase of office supplies and/or office services (“Office Expense Reimbursements”).

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9. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent in making customer refunds (“Refund Expense Reimbursements”).

Respectfully Submitted,
/s/ Frederic P. Schwieg

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Subchapter V Trustee

Respectfully Submitted,
/s/ Jack Cooper, Esq.

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Counsel for Defendant

EXHIBIT A

Squirrels Research Labs LLC
Transactions: Jessica Gritzan
All Dates

Account #	Date	Transaction Type	Num	Memo/Description	Amount	A/P Paid	Comments from D Stanfill report
1010 Checking x6063	10/16/2018	Bill Payment (Check)	589	Jessica Chevalier Reimbursements	7,274.57	Paid	International shipping
1010 Checking x6063	10/16/2018	Check	539	1525 Materials Reimbursement for Warehouse	33.59	Paid	Not listed in report provided by D Stanfill as pymt to J Gritzan
1010 Checking x6063	07/22/2019	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	3,210.47	Paid	Michael P/Dave/Jess flights
	8/16/19				1,000.00		Component order
1010 Checking x6063	12/11/2019	Check	673	No Description provided - pymt entry to acct #7140 Consulting Fees	500.00	Paid	Consulting fee
1010 Checking x6063	03/18/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	182.71	Paid	Component order
1010 Checking x6063	03/18/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	601.59	Paid	Paid against open balance
1010 Checking x6063	03/18/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,000.00	Paid	Paid against open balance
1010 Checking x6063	03/18/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	3,215.70	Paid	Paid against open balance
1010 Checking x6063	03/18/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	5,000.00	Paid	Paid against open balance
1010 Checking x6063	04/21/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	177.78	Paid	Component order
1010 Checking x6063	04/21/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	354.40	Paid	Component order
1010 Checking x6063	04/21/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	756.25	Paid	Component order
1010 Checking x6063	04/21/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,387.08	Paid	Component order
1010 Checking x6063	04/21/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,606.20	Paid	Component order
1010 Checking x6063	04/21/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	2,000.00	Paid	Jess pay to construction crew
1010 Checking x6063	04/21/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	4,777.45	Paid	Paid against open balance
1010 Checking x6063	04/21/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	20,064.86	Paid	Component order
1010 Checking x6063	05/28/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	14,000.00	Paid	Paid against open balance
1010 Checking x6063	08/13/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,800.00	Paid	Jess paid DK against balance
1010 Checking x6063	08/14/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	3,200.00	Paid	Jess paid DK against balance
1010 Checking x6063	08/26/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,011.41	Paid	Paid against open balance
1010 Checking x6063	08/26/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	3,988.59	Paid	Paid against open balance
1010 Checking x6063	08/27/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,146.91	Paid	Paid against open balance
1010 Checking x6063	08/27/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	3,853.09	Paid	Paid against open balance
1010 Checking x6063	08/28/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	2,000.00	Paid	Paid against open balance
1010 Checking x6063	10/08/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	692.61	Paid	Paid against open balance
1010 Checking x6063	10/08/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	807.39	Paid	Paid against open balance
1010 Checking x6063	10/09/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,180.86	Paid	Paid against open balance
	10/12/20				249.00		Refunded on cc
1010 Checking x6063	10/13/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	48.26	Paid	Paid against open balance
1010 Checking x6063	10/13/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	370.93	Paid	Paid against open balance
1010 Checking x6063	10/13/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,489.95	Paid	Paid against open balance
1010 Checking x6063	10/13/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	5,590.86	Paid	Paid against open balance
1010 Checking x6063	10/21/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	195.76	Paid	Paid against open balance
1010 Checking x6063	10/21/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	201.17	Paid	Paid against open balance
1010 Checking x6063	10/21/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	327.99	Paid	Paid against open balance
1010 Checking x6063	10/21/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,199.68	Paid	Paid against open balance
1010 Checking x6063	11/05/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	869.46	Paid	Digkey order
1010 Checking x6063	11/09/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	384.92	Paid	Component order
1010 Checking x6063	12/10/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,400.65	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	12/11/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	5,000.00	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	12/16/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	120.55	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	12/16/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	154.11	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	12/16/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	157.10	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	12/16/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	160.70	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	12/16/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	683.29	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	12/16/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	2,724.25	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	12/17/2020	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	3,767.79	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	01/07/2021	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	0.04	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	01/07/2021	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,557.27	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	01/13/2021	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	885.98	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	01/13/2021	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	1,091.61	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	02/03/2021	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	16.18	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	02/03/2021	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	60.06	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	02/03/2021	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	70.92	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	02/03/2021	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	84.35	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	02/03/2021	Bill Payment (Check)		No Description provided - pymt through Accounts Payable #2001	116.16	Paid	Not listed in report provided by D Stanfill

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